

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: TERRY L ORCULLO)	Case No. 25 B 01956
MICHELLE C ORCULLO)	
)	Chapter 13
Debtor(s))	
)	Judge: JACQUELINE P COX

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for March 31, 2025 10:30 am, for the following:

Section 5.1 of the proposed plan fails to include a dollar amount to allowed general unsecured claims. The Trustee objects until such time as a dollar amount is proposed. Compliance with 11 USC 1325(a)(4) and/or 1325(b) cannot be determined until this is resolved.

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: March 24, 2025

/s/ Thomas H. Hooper
Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Chris Domann, a non-attorney, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

CORBIN LAW FIRM LLC
Attorney for Debtor

(via CM/ECF)

Adam G. Brief
Acting United States Trustee

(via CM/ECF)

TERRY L ORCULLO
MICHELLE C ORCULLO
9723 ELM TER
DES PLAINES, IL 60016
debtors

(via First Class Mail)

Dated: March 24, 2025

/s/ Chris Domann

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900